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[Additional counsel listed on signature page]

**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION**

IN RE: CATHODE RAY TUBE (CRT)
 ANTITRUST LITIGATION

Master File No. 3:07-cv-05944-SC

MDL No. 1917

This Document Relates To:

Individual Case No. 11-cv-06205 SC

STATE OF FLORIDA,

Plaintiff,

v.

LG ELECTRONICS, INC., et al.,

Defendants.

**DECLARATION OF J. CLAYTON
 EVERETT, JR. IN SUPPORT OF
 DEFENDANTS' JOINT MOTION TO
 DISMISS THE STATE OF FLORIDA'S
 CLAIMS FOR INJUNCTIVE RELIEF**

Date: September 20, 2012

Time: 12:00 P.M.

Location: JAMS, Two Embarcadero
 Center, Suite 1500

Judge: Hon. Samuel Conti

Special Master: Hon. Charles A. Legge (Ret.)

MASTER FILE NO. 3:07-CV-05944-SC

MDL NO. 1917

DECLARATION OF J. CLAYTON EVERETT, JR. IN SUPPORT OF DEFENDANTS' JOINT MOTION TO
 DISMISS THE STATE OF FLORIDA'S CLAIMS FOR INJUNCTIVE RELIEF

1 I, J. Clayton Everett, Jr., declare as follows:

2 1. I am a partner with the law firm of Morgan, Lewis & Bockius LLP, counsel for
3 defendants Hitachi, Ltd., Hitachi Displays, Ltd. (n/k/a Japan Display East Inc.), Hitachi Asia,
4 Ltd., and Hitachi Electronic Devices (USA), Inc. I am licensed to practice law in the District of
5 Columbia and the Commonwealth of Virginia. I have been admitted to practice *pro hac vice* in
6 this Court in the above captioned matter. I make this declaration in support of Defendants'
7 Motion to Dismiss the State of Florida's Claims for Injunctive Relief, which was filed on October
8 4, 2012. I have personal knowledge of the facts stated herein and, if called as a witness, I could
9 competently testify thereto.

10 2. Attached hereto as Exhibit 1 is a true and correct copy of the Complaint in *Best Buy Co.*
11 *Inc. v. Hitachi, Ltd.*, No. 11-5513 (Dkt. No. 1) (N.D. Cal. Nov. 14, 2011).

12 3. Attached hereto as Exhibit 2 is a true and correct copy of the Declaration and Exhibit of
13 Tetsuro Yokoo in Support of the Hitachi Defendants' Evidentiary Proffer, *In re Cathode Ray*
14 *Tube (CRT) Antitrust Litigation*, No. 07-05944 (Dkt. No. 819, 819-1) (N.D. Cal. Dec. 7, 2010).

15 4. Attached hereto as Exhibit 3 is a true and correct copy of the Declaration of Katsuyuki
16 Kawamura in Support of the Hitachi Defendants' Evidentiary Proffer, *In re Cathode Ray Tube*
17 *(CRT) Antitrust Litigation*, No. 07-05944 (Dkt. No. 820) (N.D. Cal. Dec. 7, 2010).

18 5. Attached hereto as Exhibit 4 is a true and correct copy of the Declaration of Raymond
19 Teng in Support of the Hitachi Defendants' Evidentiary Proffer, *In re Cathode Ray Tube (CRT)*
20 *Antitrust Litigation*, No. 07-05944 (Dkt. No. 822) (N.D. Cal. Dec. 7, 2010).

21 6. Attached hereto as Exhibit 5 is a true and correct copy of the Declaration and Exhibits of
22 L. Thomas Heiser in Support of the Hitachi Defendants' Evidentiary Proffer, *In re Cathode Ray*
23 *Tube (CRT) Antitrust Litigation*, No. 07-05944 (Dkt. No. 825 –825-2) (N.D. Cal. Dec. 7, 2010).

24 7. Attached hereto as Exhibit 6 is a true and correct copy of the Supplemental Responses and
25 Objections of Panasonic Corp. of N. Am., MT Picture Display Co., Ltd. and Panasonic Corp. to
26 Direct Purchaser Plaintiffs' First Set of Interrogatories, Dec. 17, 2010.

1 8. Attached hereto as Exhibit 7 is a true and correct copy of the Second Supplemental
2 Responses and Objections of Panasonic Corp. of N. Am., MT Picture Display Co., Ltd. and
3 Panasonic Corp. to Direct Purchaser Plaintiffs' First Set of Interrogatories, Nov. 3, 2011.

4 9. Attached hereto as Exhibit 8 is a true and correct copy of the Tatsuo Tobinaga 30(b)(6)
5 Deposition Transcript, July 16, 2012.

6 10. Attached hereto as Exhibit 9 is a true and correct copy of the Objections and Responses of
7 Panasonic N. Am., MT Picture Display Co., Ltd. and Panasonic Corp. to DPPs' First Set of
8 Interrogatories, May 23, 2010.

9 11. I declare under penalty of perjury under the laws of the United States that the foregoing is
10 true and correct.

11 Executed this 4th day of October, 2012, at Washington, D.C.

12
13 /s/ J. Clayton Everett, Jr.

14 J. Clayton Everett, Jr.
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